C6B-CC-0713

Office of the Secretary Federal Communications Commission Attention: CBG Room 3-B431 445 12th St. SW Washington, DC 20554 RECENED & INSPECTED

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FCC - MAIL ROOM

To whom it may concern,

HuntFish TV respectfully submits this petition requesting exemptions from the closed captioning requirements under the Commission's Rules, 47 C.F.R. 79.1 based on the undue burden standard and regulations.

INTRODUCTION AND OVERVIEW:

HuntFish TV was formed in April 2007. The primary objective of the show is to provide current fishing and hunting information and entertainment in the Upper Midwest. I produce 26 shows per year, with a new show every other week. I am the only full time employee.

The program is filmed on location in Minnesota, Iowa, Wisconsin, North Dakota, and South Dakota. I film twice a week and edit video on days I am not filming. My show gets sent every other Wednesday to Network Station to be aired Saturday and Sunday of that week.

The program length is 28 minutes and 30 seconds. My show is supported through advertising and mailed to WKBT Lacrosse, WI. The show airtimes are Saturday and Sunday of each week at 5:30 pm. We purchase the airtime from WKBT and sell the advertising.

Due to financial constraints, I am personally responsible for the entire production of each episode. I host and edit the show. I hire photographers as independent contractors.

NATURE AND COST OF THE CLOSED CAPTIONING FOR THE PROGRAMMING:

As we looked into companies that can perform closed captioning on my show's behalf, we found quotes from \$350-\$700 per episode. Most companies require a 5 business day turn-around. With the financial hardship that this would bring to a one-man company, it would change the concept and quality of the show. This additional cost could cause a loss of sponsors due to the higher rates and cost of sponsorships.

Closed captioning would be impossible with my current format of show airing.

SHOW FORMAT:

HuntFish TV has myself as the host. Along with myself, my show features guest fishing and hunting experts during each show airing. We discuss and demonstrate fishing and hunting techniques and also display sponsored products. We use many logos, graphics, and pictures that require the entire screen. By using the whole screen, another source of revenue would be jeopardized.

FINANCIAL INFORMATION

Since we are a new startup business we currently have many costs with equipment and production. I am currently working out of my home and cannot afford an office space or additional staff to ease my workload.

In 2007 I will face higher business costs due to traveling and high gas prices filling the boat up with gas. We have already started to budget for getting High Definition cameras to meet future F.C.C. requirements.

SUMMARY

I request the commission grant us "HuntFish Tv" a full exemption from Close Captioning, this would create an undue burden.

- 1. I will continue to use graphics and written information on the screen during show
- 2. Close Captioning will greatly reduce my income, especially being a startup company.
- 3. My goal is to keep the show current as possible with airing a new show every two weeks.
- 4. Close Captioning could also cause a loss of sponsors due to higher advertising prices per show.

EXEMPTION FROM CLOSED CAPTIONING UNDER THE COMMISSION'S RULES, 47 C.F.R. 79.1 BASED ON THE UNDUE BURDEN STANDARD AND REGULATIONS.

Thanks you for your consideration in exemption from closed captioning, I look forward to your response.

HuntFish Tv

By:

Andy Loos

Sole Owner

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